

## **Monitoring Plan for Special Account Planning Data**

Regions are responsible for entering special account planning data into the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS). The regions update special account planning data in CERCLIS on a continual basis as warranted by site activity and at a minimum twice a year in preparation for annual work planning and mid-year review processes outlined below. The Office of Superfund Remediation and Technology Innovation (OSRTI) and the Office of Site Remediation Enforcement (OSRE) are responsible for maintaining the data entry screens and monitoring the special account planning information entered into CERCLIS by the regions.

Outlined below is the process OSRTI and OSRE will undertake with the regions to monitor special account planning data in CERCLIS. The months in *italics* represent the general timeframes these actions will occur, but may change based on the annual work planning and mid-year review timeframes established by the Superfund program.

### **1. Review special account planning data from initial data pulls in preparation for annual work planning reviews. (*August*)**

#### **a. Use data analysis to identify and address data related issues**

Review special account planning data using developed monitoring reports to ensure that regions are entering quality data, complying with special account guidance, and effectively managing special accounts. EPA will monitor accounts to ensure that, among other things, funds are being appropriately planned for use in accordance with guidance, funds are considered during settlement negotiations, and reclassifications and transfers are occurring in a timely manner. Particular areas of focus will include, but is not limited to, accounts at construction complete sites and sites deleted from the National Priorities List, accounts that have not disbursed any funds, accounts 10 years old or more, and accounts with available balances of \$10 million or greater. Analysis of special account data will also help identify areas of needed improvement in the management of special accounts.

### **2. Dialogue with regions on special account planning data. (*August – September*)**

Annual work planning dialogues will take place in August and September to review the initial data entered by the regions. These dialogues will focus on region specific issues, but also help to identify national trends.

### **3. Regions enter final special account planning data as a result of regional work planning discussions. (*October*)**

Based on the regional discussions and issues identified at both a regional and national level, regions are expected to make corrections to planned special account uses in CERCLIS before the final data pull, which will be used to report to management on special accounts and establish a baseline for fiscal year planning data.

### **4. Review special account data from final CERCLIS pull to see if regions are planning appropriately and planning comports with EPA guidance. (*October-November*)**

The final data pull from CERCLIS will typically take place mid-October. This data will be the official data EPA uses to report on the management and use of special accounts to internal and external parties, as well as provide a baseline for fiscal year planning data. The data will be reviewed to ensure that regions are complying with guidance and effectively managing special accounts. Analysis of this data will allow EPA to monitor the plans for available special account funds and identify areas where additional data or program analysis is needed.

**5. Prepare reports for the Special Accounts Senior Management Committee, EPA's Annual Performance Plan and Congressional Justification, and other stakeholders. (December)**

The reports to the Special Accounts Senior Management Committee should include recommendations based on the analysis of final planning data, if appropriate. The appendix to EPA's Annual Performance Plan and Congressional Justification with special account financial and planning information, and other stakeholder reports, are high level reports in public venue(s) reporting on a national level, which do not include confidential planning data.

**6. Review data from initial data pulls in preparation for mid-year reviews. (March-April)**

Mid-year data reviews will be used to follow-up on regional issues and monitor planned actions identified in the final data from annual work planning. The data will be pulled using developed monitoring reports and will be reviewed to ensure that regions are entering quality data and complying with guidance. EPA will monitor accounts to ensure that, among other things, funds are being appropriately planned for use, funds are considered during settlement negotiations, and reclassifications and transfers are occurring in a timely manner. Particular areas of focus will include, but is not limited to, accounts at construction complete sites and sites deleted from the National Priorities List, accounts that have not disbursed any funds, accounts 10 years old or more, and accounts with available balances of \$10 million or greater. Analysis of data will also help identify areas of needed improvement in the management of special accounts.

**7. Dialogue with regions on mid-year special account planning data. (April-May)**

Mid-year dialogues will typically take place in April and May to review the special account planning data entered by the regions. These dialogues will focus on the status of completing near-term actions identified in the annual work planning dialogues and final planning data, as well as changes in the data since annual work planning. They will also focus on region specific issues and accounts, but also help to identify national trends.

**8. Ad Hoc Regional Follow-up (Ongoing)**

**a. National Conference Calls**

In preparation for mid-year review and annual workplanning sessions, use the special accounts national conference calls to solicit regional input for improving regional planning of special accounts and inform the regions of OSRTI and OSRE plans to pull data.

**b. Stakeholder Inquiries**

In response to stakeholder inquiries (i.e., OIG, OMB, Congress, FOIA), information may need to be gathered by running data pulls or talking to the region(s) involved.